

The safety association of the commercial explosives industry • Founded 1913

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LEGS./REGS. DIV.

Docket Clerk, Room 4232
Office of the Chief Counsel
Federal Highway Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

FHWA-97-2277-14

REF: FHWA DOCKET NO. MC-96-6

The Institute of Makers of Explosives (IME) is the safety association of the commercial explosive industry in North America. The thirty one IME member companies and their 60-odd subsidiaries manufacture and distribute about ninety percent of the approximately five billion pounds of commercial explosives used annually in the United States.

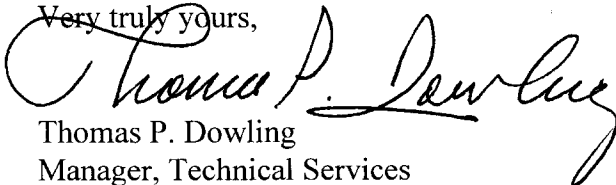
IME member companies and subsidiaries are both shippers and carriers of hazardous materials and a number of companies operate their own vehicle fleets.

IME offers the following comments to the rule proposed under Docket No. MC-96-6:

- 1) There is no need to increase from one year to three years the period of time for which carriers must record accident information in the accident register. In light of Secretary Pena's call for DOT to be more "customer" oriented it would be more appropriate for the accident data to be kept in the D.O.T. Profile where it would be readily accessible.
- 2) In investigating and/or responding to investigative inquiries concerning drivers' previous employment records how will inquiry and response need to be substantiated? Will it be necessary to document all correspondence by *Certified Mail, Return Receipt Requested*? Information regarding a driver's employment record should be incorporated into the *Motor Vehicle Report* records and then any need for employment information could be readily obtained by checking the *MVR* records.

We appreciate the opportunity to submit these comments on Docket No. MC-96-6.

Very truly yours,


Thomas P. Dowling
Manager, Technical Services

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